

National Aeronautics and
Space Administration
Headquarters
Washington, DC 20546-0001



March 1, 2004

Reply to Attn of: GG

TO: Distribution

FROM: G/General Counsel

SUBJECT: Blanket Determination Regarding Attendance at the Ted Stevens Foundation Dinner at the Capitol Hilton in Washington, DC, on March 10, 2004

On March 10, 2004, the Ted Stevens Foundation will be holding a dinner, *A Salute to the President Pro Tempore*, at the Capitol Hilton in Washington, DC. The Ted Stevens Foundation is an Alaskan non-profit 501 (c)(3) organization that was formed by Alaskans to create a permanent legacy to the career of Senator Stevens. The Foundation's goals include preserving the papers and records of Senator Stevens's career and supporting the causes that he has worked for during his time in the Senate. The Foundation will support programs that encourage communication, promote physical activity and sports, and preserve and protect the unique Alaska lifestyle and cultures.

This event will be widely attended by members of Congress, NASA, and representatives from the public and private sector. Approximately 400 people are expected to attend the event. The estimated cost of the dinner is approximately \$125 per person. I find that this event meets the requirements of a "widely attended gathering" as defined in 5 CFR § 2635.204(g). The event allows NASA employees an opportunity for an exchange of information among Congressmen, Administration officials, and members of the public about Federal Government matters. While part of the evening will include fundraising, NASA employees will not solicit funds nor participate in the fundraising, except in their private capacity in accordance with the Standards of Ethical Conduct for Employees of the Executive Branch. I have determined it to be in NASA's best interest for NASA personnel to attend the dinner in their personal capacities and not as representatives of NASA.

Accordingly, NASA personnel and their accompanying spouses or other guests may accept free attendance, food, refreshments, and entertainment furnished to all attendees as an integral part of the event.

A handwritten signature in black ink, appearing to read "Paul G. Pastorek".

Paul G. Pastorek